

December 19, 2001

U.S. Department of Transportation  
Dockets Management Facility, Room PL-401  
400 Seventh Street, SW  
Washington DC 20590

**RE: FHWA Docket No. FHWA—2001-8954**

Dear Sir or Madam:

The Maryland State Highway Administration offers the following comments on the Federal Highway Administration's regulation on National Bridge Inspection Standards:

#### **APPLICATION OF STANDARDS**

- The qualifying bridge length should be measured from back of backwall to back of backwall for beam type structures.
- Guidance is needed on how to determine the qualifying length for long culverts that run roughly parallel to the roadway.

#### **QUALIFICATIONS OF PERSONNEL**

- There should be some clarification of what is meant by "individual in charge of the inspection and reporting ..."
- The option that this individual be "qualified for registration as a professional engineer" needs to be clarified to explain what this means, such as a person who has passed the PE exam, but is awaiting issuance of the official license.
- The individual in charge should have to have the same training as the bridge inspectors.
- There should not be a requirement that the inspectors, who all take a course in inspection, be civil / structural engineers, nor should the inspectors need to be licensed professional engineers. In addition, it would be very difficult to attract graduate engineers to this field.
- The regulations should be more specific as to the discipline of the professional engineer in charge, i.e., structural, civil.

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- Engineers in Training (EIT) should qualify as team leaders if they have two years of bridge inspection experience and have taken the required training courses.
- The term “in a responsible capacity” should be clarified in the section dealing with the individual in charge.
- Additional training should be required, proportional to the complexity of the structures to be inspected, i.e., movable bridges.
- The qualifications for divers should be established.
- Divers should not be required to be professional engineers. If this were made a requirement, then the impact would be significant, as there are not many divers who are professional engineers.

If you have any questions or concerns, please do not hesitate to contact Mr. Richard Woo, SHA’s Director of Policy and Research at 410-545-0340, 1-888-204-0517 or, by e-mail, at [rwoo@sha.state.md.us](mailto:rwoo@sha.state.md.us). He will be happy to assist you. Of course, you should always feel free to contact me directly.

Sincerely,

Parker F. Williams  
Administrator

cc: Mr. Earle S. Freedman, Director of Bridge Development, State Highway Administration  
Mr. Neil J. Pedersen, Deputy Administrator for Planning and Engineering, State Highway Administration  
Mr. Richard Woo, Director of Policy and Research, State Highway Administration